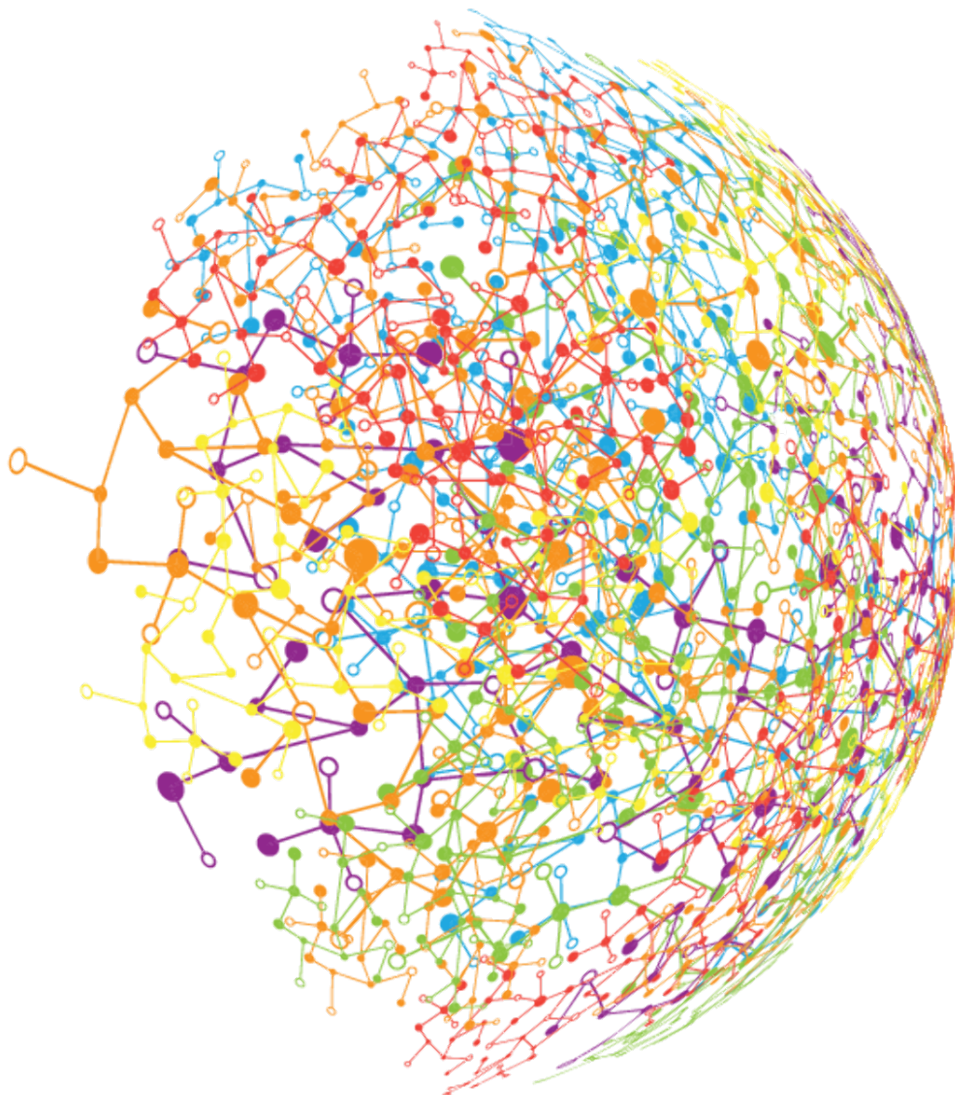


Studio Tributario e Societario



Covid-19 | Tax Alert | N. 1

March 2020

Deloitte.

Tax

Transformation into tax credit of the Deferred Tax Assets computed on tax losses and Notion Interest Deduction (NID) excess (both carried forward) for the corporations selling credit not cashed

(Art. 55 Law Decree n. 18, March 17, 2020, effective since March 17, 2020)

The aim of the provision is to give financial support to the Italian companies through the transformation of a "deferred" asset into a tax credit to be "spent".

Corporations selling within December 31, 2020, credits not paid, can transform into tax credit the DTA accrued on tax losses and NID excess to be carried forward, regardless the relevant registering in the statutory financial statement. For the purpose of the provision, "credits not paid" are those not cashed within 90 days from the relevant payment expiration date. Limits and procedures for the relevant transformation are provided by the Decree, stated that the tax credit (i) can be offset with no limits, (ii) can be transferred to related parties under the provision of the Italian tax law (artt. 43-bis and 43-ter of the Presidential Decree n. 602/73) and (iii) is not taxable for income tax purposes. No transformation is granted for credit sold intra-group.

Postponement of the tax payments due on March 16, 2020 for all the taxpayers

(Art. 60 Law Decree n. 18, March 17, 2020, effective since March 17, 2020)

General postponement for all the taxpayers.

Payments to public administration (included tax payments) due on March 16, 2020, are postponed to March 20, 2020.

Postponement of the withholding tax, social contribution and VAT payments due by the subjects operating in certain business

(Art. 61 Law Decree n. 18, March 17, 2020, effective since March 17, 2020)

The aim of the provision is to give assistance to the entities operating in the sectors more heavily impacted by the Covid-19 emergency.

The provision of art. 8 of the Presidential Decree 9/2020 foreseeing that for the entities carrying on touristic and accommodation activities (such as hotels), travel agencies and tour operators, having their legal or operative seat in Italy, the withholding tax payments due on employment income and similar and social contributions fulfillments and

payments due from March 2, 2020, to April 30, 2020, are postponed to May 31, 2020, is extended to other business activities.

In particular, the postponement is extended *inter alia* to sport entities, entities managing theatres, cinema etc., exhibit companies, restaurants, bars or pubs, entities managing assistance for old or disable people, childhood care, thermal sites, touristic guides, etc.. For all the above subjects the VAT payments due in the month of March 2020 are suspended. The suspended payments have to be made within May 31, 2020, in one or up to five equal monthly installments. Sport entities' fulfillments are postponed to June 30, 2020.

Postponement of tax and social contribution fulfillments

(Art. 62 Law Decree n. 18, March 17, 2020, effective since March 17, 2020)

For all the taxpayers the provision is to postpone any tax fulfillment falling in the period covered by the suspension and for the subjects of lower dimension to postpone also certain payments.

All the tax fulfillments (other than the tax payments and withholding tax to be withheld) expiring from March 8, 2020, to May 31, 2020 are postponed and have to be made within June 30, 2020. No penalties are applied.

For the subjects carrying on business, art or professional activities having their residence, legal or operative seat in Italy with a turnover lower than 2 millions Euro (in the previous fiscal year) also certain tax payments due from March 8, 2020, to March 31, 2020, are postponed (i.e. withholding tax applied on employees' income, VAT, social contribution).

VAT payments are postponed, regardless the level of turnover, for the subjects carrying on business, art or professional activities having their residence, legal or operative seat in the following Municipalities Bergamo, Cremona, Lodi or Piacenza.

The postponed payments have to be made within May 31, 2020, in one or upto five equal monthly installments.

For the subjects having their legal or operative seat in Italy, with a turnover lower than 400.000 Euro (in the previous fiscal year), the revenues cashed during the period between the date in which the Decree has entered into force and March 31, 2020 are not subject to the withholding taxes provided by artt. 25 and 25-bis of Presidential Decree n. 600/1973, provided that in the preceding month no employment costs are incurred. The taxpayers enjoying this option: (i) make to its withholding agent a specific declaration according to which the revenues to be paid are not subject to withholding tax pursuant to the present rule (ii) directly pay the withholding taxes, not applied by the withholding agent, within May 31, 2020, or by up to five equal monthly installments starting from May 2020, without application of penalties and interests.

Bonus to be paid to the employees' for the month of March 2020

(Art. 63 Law Decree n. 18, March 17, 2020, effective since March 17, 2020)

An extraordinary bonus has to be paid by the employers to their employees for the month of March 2020.

The employers have to pay to their own employees, having an overall income lower than 40.000 Euro in the previous fiscal year, for the month of March 2020, an extraordinary bonus equal to 100 Euro to be calculated based on the working days spent in their office premises. The bonus is not subject to taxation and has to be paid since the month of April. The withholding agent can offset the extraordinary bonus by the provision of art. 17, Legislative Decree 241/1997.

Suspension of the expiration terms related to the activity of the Tax Authorities

(Art. 67 Law Decree n. 18, March 17, 2020, effective since March 17, 2020)

With the provision, the expiration terms related to the activity carried out by the Tax Authorities (e.g. tax audit, tax collection and litigation, etc.) are postponed.

All the expiration terms related to activities of liquidation, audit, collection and litigation carried out by the Italian Tax Authorities are suspended from March 8, 2020, to May 31, 2020. The same suspension period applies to the terms related to the tax ruling requests filed

before or during the suspension period.

The statute of limitation and other deadlines related to the activities carried out by the Tax Authorities expiring in 2020 have to be considered postponed of two additional years (i.e. 2022) in accordance with the Italian legislation regarding the extraordinary events (art. 12, Legislative Decree 159/2015).

Postponement of certain tax payments

(Art. 68 Law Decree n. 18, March 17, 2020, effective since March 17, 2020)

The provision postpones the payments due based on executive tax collection procedures for all the taxpayers.

Certain tax payments (such as executive tax payments notices, social contribution executive payments requests, executive assessment acts issued by the Local Offices or by the Custom Duties Office) due between March 8, 2020, and May 31, 2020, are postponed to June 30, 2020. Certain settlements payments, expiring on February 28 and March 31, are due by May 31, 2020. No refund shall be made in case of anticipated payments. Also in this case the Italian legislation regarding the extraordinary events (art. 12, Legislative Decree 159/2015) is applicable, and, therefore, also the acts to be issued by the Tax Authorities in the collection procedure or in case of litigation have to be considered postponed.

Mention of the renounce of any postponement

(Art. 71 Law Decree n. 18, March 17, 2020, effective since March 17, 2020)

It is an option for taxpayers renouncing to any postponement.
Taxpayers renouncing to any tax payment postponement (as provided by the Decree or by other special provisions) can ask to be mentioned on the web site of the Ministry of Finance.

Any court hearing and trial fulfillment for civil, criminal, tax or military juridical procedures is suspended and postponed from March 9, 2020, to a date subsequent to April 15, 2020

(Art. 83 Law Decree n. 18, March 17, 2020, effective since March 17, 2020)

Court hearings and trial fulfillments are postponed for all the procedures pending included those pending in front of the Tax Courts.

The Decree foresees that all the expiration terms of the court hearings and of the related trial fulfillments, pending in the period from March 9, 2020 to April 15, 2020, are postponed after April 15 2020.

Also the appeal in front of the first degree tax court is suspended until April 15, 2020.

The previously issued postponement provisions included in the Law Decree 11/2020 (art. 1 and 2) are abolished.

The Presidents of local Tax Courts, for public health reason, can postpone the court hearing to a date subsequent to June 30, 2020.

Suspension of the terms related to administrative procedures

(Art. 103 Law Decree n. 18, March 17, 2020, effective since March 17, 2020)

The aim is to postpone any term related to administrative procedures.

For all the administrative procedures pending on February 23, 2020, or set up hereafter, the time between such date and the date of April 15, 2020, is not computed for the relevant terms.

In case of silence acceptance or silence reject, the relevant expiration term is postponed after April 15, 2020.

The above provisions do not apply to the terms provided by the regulations issued as per the Covid-19 emergency.

Corporation meetings rules to be held

(Art. 106 Law Decree n. 18, March 17, 2020, effective since March 17, 2020)

The ordinary shareholders' meeting to be called at least once a year in accordance with the Italian Civil Code, *inter alia* to approve the statutory financial statement, has to be held by 180 days from the end of the business year (instead by the ordinary term of 120 days, see art. 2364, second paragraph, and art. 2478-bis Civil Code).

Moreover, corporation meetings called within July 31, 2020, or until the end of the Covid-19 emergency, if subsequent, can be conducted under particular methods (votes by electronic methods or by mail, participation by telecommunication etc., to be detailed in the calling).

In addition to the provisions of the Decree already examined, please find here below a brief summary of the regulations issued as per the Covid-19 emergency still effective or modified by the Decree itself.

Tax payments and tax fulfillments due by the subjects located in the Municipalities included in the Red Zone

(Decree of the Ministry of Finance dated February 24, 2020, effective since February 26, 2020)

The provision covers only the taxpayers resident in the Municipalities included in the Red Zone postponing tax payments and tax fulfillments for a certain time period.

Tax payments and tax fulfillments due from February 21, 2020, to March 31, 2020, by the individuals and the entities having their residence, legal seat or operative seat in the Municipalities included in the so called Red Zone as of February 21, 2020 (see Presidential Decree February 23, 2020, and March 1, 2020) are postponed to May 31, 2020.

The withholding tax agents located in the Municipalities included in the mentioned Red Zone do not withhold any withholding tax on the employees' income and similar for

the period from February 21, 2020, to March 31, 2020.

The calendar to file the individuals' annual tax returns (730-Model) and all the pre-filled-in tax return fulfillments have been modified for the year 2020

(Art. no. 1, Law Decree March 2, 2020, n. 9 effective since March 2, 2020)

The new calendar regards individuals' annual tax return and the fulfillments to be made by the withholding tax agents.

The Decree has confirmed that the new individuals' tax return calendar, as introduced by the Law Decree n. 124/2019, has been anticipated to the fiscal year 2020. Accordingly to the new calendar some fulfillments have been postponed only for the fiscal year 2020.

Postponement of certain tax payments for subjects located in the municipalities included in the Red Zone as of February 21, 2020

(Art. 2 Law Decree March 2, 2020, n. 9 effective since March 2, 2020)

The provision covers only the taxpayers resident in the Municipalities included in the Red Zone.

Certain tax payments (such as executive tax payments notices, social contribution executive payments requests, executive assessment acts issued by the Local Offices or by the Custom Duties

Office, certain settlement tax payments) due between February 21 and April 30 by the individuals resident or the entities having the legal seat or the operative seat within the Municipalities included in the so called Red Zone (see Presidential Decree March, 1, 2020, Attachment no. 1 for the relevant list) are postponed to May 31, 2020. No refund shall be made in case of anticipated payments.

Postponement of the withholding tax and social contribution payments due by the subjects operating in the touristic and accommodation business (i.e. hotels)

(Art. 8 Law Decree March 2, 2020, n. 9 effective since March 2, 2020)

The provision was issued to help one of the business sectors that has been more impacted by the Covid-19 emergency. The Law Decree has extended the provision to other sectors (see above for details).

For the entities carrying on touristic and accommodation activities (such as hotels), travel agencies and tour operators, having their legal or operative seat in Italy, withholding tax payments due on employment income and similar and social contributions fulfillments and payments due from March 3, 2020, to April 30, 2020, are postponed to May 31, 2020.

Moreover, for the same subjects if located in the Municipalities included in the Red Zone (as listed by the Presidential Decree March 1, 2020, Attachment no. 1) withholding tax on employment income and similar are not withheld for the period from

February 21, 2020 to March 31, 2020.

Suspension of trials fulfillments for the subjects having their operative seat or carrying on their business in the Municipalities included in the Red Zone (as listed by the Presidential Decree March 1, 2020, Attachment no. 1)

(Art. 10 Law Decree March 2, 2020, n. 9 effective since March 2, 2020)

Also this provision covers only subjects locate in the Red Zone.

For the above mentioned subjects any trial fulfillment (such as mandatory deadlines or expiration terms) is suspended from February 22, 2020, to March 31, 2020, and the relevant expiration term shall start running at the end of the mentioned period (included any fulfillments whose expiring timing begins during the period of suspension).

Access to the office of the Milan tax court

(Decree issued by the Director of the Tax Court, n. 6, March 5, 2020)

The access to the front office and to the secretary office is granted under appointment from 9 a.m. to 1 p.m. from Monday through Friday.

Access to the Local Tax Agency offices

(Press communication dated March 9 and 10, 2020)

In the mentioned press communications the Tax Agency requests taxpayers to use the web and online channels of communication as much as possible and informs that reduced opening times are provided for the offices and only for certain services.

Taxpayers	Tax payment or fulfilment postponed	New deadline
All the taxpayers	All the tax fulfilments (other than the tax payments and withholding tax to be withheld) expiring from March 8, 2020, to May 31, 2020	June 30, 2020
All the taxpayers	Payments to public administration (included tax payments) due on March 16, 2020	March 20, 2020
All the taxpayers	Certain tax payments (such as executive tax payments notices, social contribution executive payments requests, executive assessment acts issued by the Local Offices or by the Custom Duties Office) due between March 8, 2020, and May 31, 2020	June 30, 2020
Taxpayers applying certain procedures to settle tax positions with the Italian Tax Authorities	Settlements payments, expiring on February 28 and March 31, 2020	May 31, 2020
Entities operating in certain business sectors (such as touristic and accommodation service entities, sport entities, entities managing theatres, cinema etc., exhibit companies, restaurants, bars or pubs, entities managing assistance for old or disable people, childhood care, thermal sites, touristic guides, etc.)	Withholding tax payments due on employment income and similar and social contributions fulfilments and payments due from March 2, 2020, to April 30, 2020. VAT payments due in the month of March 2020	The suspended payments have to be made within May 31, 2020, in one or up to five equal monthly installments. Sport entities' fulfilments are postponed to June 30, 2020
Subjects carrying on business, art or professional activities having their legal or operative seat in Italy with a turnover lower than 2 millions Euro (in the previous fiscal year)	Tax payments due from March 8, 2020, to March 31, 2020 (i.e. withholding tax applied on employees' income, VAT, social contribution)	May 31, 2020, in one or upto five equal monthly installments
Municipalities Bergamo, Cremona, Lodi or Piacenza	VAT payments are postponed, regardless the level of turnover, for the subjects carrying on business, art or professional activities having their residence, legal or operative seat in the following Municipalities Bergamo, Cremona, Lodi or Piacenza	
Individuals and entities having their residence, legal seat or operative seat in the so called Red Zone as of February 21, 2020	Tax payments and tax fulfilments due from February 21, 2020, to March 31, 2020	May 31, 2020

Incentives

Incentives for the production and supply of medical devices

(Art. 5 of Law Decree no. 18 published in the official gazette on 17 March 2020)

Article 5 of the Decree no. 18/2020, in order to ensure the production and supply of medical devices and personal protective equipment, including surgical masks, provides that Special Commissioner, appointed according to art. 122 of the Decree is authorized to grant grants and subsidized loans to companies manufacturing such devices. Invitalia S.p.A. will manage the incentive.

Contributions to business for security and health care improvements

(Art. 43 of Law Decree no. 18 published in the official gazette on 17 March 2020)

Article 43 of the Decree provides specific measure in order to guarantee and support the continuity, in safety and security of the production processes of companies, due to the Coronavirus emergency. Such rules provide that National Institute for Occupational Safety (Inail) will transfer to Invitalia S.p.A., until April 30th, 2020, the amount of 50 million euros. Such

amount will be granted to companies for the purchase of equipment and other personal protective equipment. The measure will grant investments and training in occupational health and safety aimed in particular at small, medium and micro enterprises and projects aimed at testing innovative solutions and organizational and management tools inspired by the principles of corporate social responsibility.

SMEs Guarantee Fund

(Art. 49 of Law Decree no. 18 published in the official gazette on 17 March)

The rules introduced amendments and increasing provision to the SMEs Guarantee Fund. More in detail, article 49 of the Decree no. 18 provides that for a period of 9 months from the date of entry into force of this Decree, the Fund's guarantee is granted free of charge and increased to Euro 5 million per individual company. This guarantee is designed for investments and restructuring of debt situations, in compliance with the guarantees and limits provided by the measure itself. Furthermore, it is provided the increasing in the maximum percentage of guarantee, to the extent of 80% for direct guarantee operations; and to the extent of 90% for reinsurance operations, for the financing operation up to 1.5 million Euros. The guarantee is

granted if the lender grants new liquidity for an amount at least equal to 10% of the outstanding debt. The measure also provides that the Fund's guarantee may be cumulated with other forms of guarantee acquired on loans, with reference to real estate investment operations in the tourism - hotel and real estate sectors, with a minimum duration of 10 years and for an amount exceeding Euro 500.000 and it could be cumulated with other type of guarantee. Among other, article 49 of the Decree provides that the deadlines relating to the administrative formalities for operations covered by the Fund's guarantee have been extended for three months. Furthermore, the government measure increases the guarantee fund for small and medium-sized enterprises by 1,500 million Euros for the year 2020.

Tax credit for the costs of sanitizing the environment

(Art. 64 of Law Decree no. 18 published in the official gazette on 17 March)

In order to promote the sanitization of the workplace, as a measure to contain the contagion of the COVID-19 virus, article 64 of the Decree provides that a tax credit is granted to companies and professionals, for the fiscal year 2020, in the amount of 50 percent of the costs of sanitization of environments and

work tools up to a maximum amount of Euros 20.000. Such incentive is applicable for the fiscal year 2020 and within the end of the available resources for the year 2020, equal to 50 million Euros. The implementing provisions shall be defined by a specific Decree of the Minister of Economic Development, in agreement with the Minister of Economy and Finance, to be issued within thirty days from the date of entry into force of this Decree.

Tax credit for shops and stores

(Art. 65 of Law Decree no. 18 published in the official gazette on 17 March)

In order to limit the negative effects of prevention and containment measures related to the emergency COVID-19, the article 65 of the Decree grants a tax credit of 60% of the amount of the rent cost for March 2020 related to buildings falling under cadastral category C/1. The tax credit is available for companies carrying out an activity different from food stores, pharmacies, etc..

The credit can be used to offset any kind of tax liability according to article 17 of Legislative Decree no. 241 of 9 July 1997.

Fund for "Made in Italy Fund"

(Art. 72 of Law Decree no. 18 published in the official gazette on 17 March)

Pursuant to article 72 of the Decree it has been established, at the Ministry of Foreign Affairs and

International Cooperation, a fund for "Made in Italy Fund".

The Made in Italy Fund intends to strengthen the instruments of promotion and support for internationalization, aimed at the implementation of a series of initiatives, including, for example:

- i) the realization of an extraordinary communication campaign aimed at supporting Italian exports and the internationalization of the national economic system in the agri-food sector and other sectors affected by the emergency;
- ii) the strengthening of the country's promotional activities;
- iii) the co-financing of production initiatives aimed at foreign markets through the signing of other agreements;
- iv) the co-financing up to 50% of the grants. Co-financing is granted according to the "De Minimis" regime.

The Made in Italy Fund is therefore intended to strengthen activities such as: the extraordinary plan to support Made in Italy through the ICE, the extraordinary plan for the promotion of Italian culture and language abroad as well as the internationalization of the production system and scientific and technological cooperation at international level.

Increase in the budget of development contracts

(Art. 80 of Law Decree no. 18 published in the official gazette on 17 March)

With the aim of keeping the development contract facilitation desk open and encouraging the attraction of investment and the implementation of development

projects, Article 80 of the Decree authorizes the spending of a further 400 million euros for the year 2020, increasing the amounts, equal to 100 million Euros, already assigned with the Budget Law 2020.

It should be noted that the development contracts, established by art. 43 of Decree Law no. 112 of 25 June 2008, converted into law, with amendments, with Conversion Law no. 133 of 6 August 2008, are aimed at implementing strategic and innovative development programs of significant importance for the strengthening of the country's production structure and is the main support measure for large investments throughout the country.

These programs may consist of one or more related projects and include also research, development and innovation activities in different sectors. Projects for industrial development, transformation and commercialization of agricultural products, environmental protection and the development of tourism activities are eligible.

Contribution for those carrying out non-scheduled transport services

(Art. 93 of Law Decree no. 18 published in the official gazette on 17 March)

Article 93 of the Decree introduces a contribution for the subjects those carrying out non-scheduled transport services, in order to limit the circulation of the Coronavirus and grants safety measure for the drivers and passengers. Indeed, the provision grants to those subjects that provide non-scheduled public transport services, which supply the vehicles used for the same services with dividing

bulkheads capable of separating the driver's seat from the customers' seats, equipped with the necessary certificates of conformity, type-approval or similar authorization, a contribution of up to 50% of the cost of each device installed, within the limits of the available resources,.

Within sixty days of the date of entry into force of this measure, a decree issued by the Minister of Infrastructure and Transport, in agreement with the Minister of Economy and Finance, shall determine the maximum amount of the recognized contribution and the procedures for the submission of applications for the contribution and its allocation.

Changes to the tax credit for advertising investments

(Art. 98 of Law Decree no. 18 published in the official gazette on 17 March)

In order to support the public rules of the daily and periodical press, Article 98 of the Decree provides for changes to the measure of the tax credit for advertising investments, provided for by Article 57-bis of Decree Law no. 50 of 24 April 2017. In particular, for 2020 the tax credit will be granted for a single amount of 30% of the value of investments made and no longer for 75% of incremental investments compared to the previous year.

For 2020, electronic communication for the "booking" of the tax credit is filed in the period between September 1st and 30th of the same year, instead of in the period between March 1st and 31st. The electronic communications filed in the period between March 1st and 31st, 2020 remain in any case valid.

We point out that the explanatory note to this Decree would seem to extend this regime to the three-year period 2020-2022.

Measures in favour of beneficiaries of special loans granted by Invitalia S.p.A., having their head office or operating units located in the municipalities of the so-called Red Zone

(Art. 6 of Law Decree no. 9 of March 2nd, 2020, which came into force on March 2nd, 2020)

Article 6 of Law Decree no. 9/2020 provides for special loans' beneficiaries granted by Invitalia S.p.A., who have their head office or operating units located in one of the so-called Red Zone municipalities, the possibility to benefit from the suspension of twelve instalments payments, of the above-mentioned loans, with expiry date no later than December 31th, 2020. The Decree also provides a corresponding extension of the amortization plans' duration. The benefit is also applicable if Invitalia S.p.A. has already adopted the termination of the loan contract due to late payments in the repayment of the instalments, unless the relative credit is already registered or there are pending disputes for its recovery.

Increase in the budget of the SMEs Guarantee Fund

(Art. 25 of Law Decree no. 9 of March 2nd, 2020, which came into force on March 2nd, 2020)

According with article 25 of Law Decree no. 9/2020, the guarantee of the Fund dedicated to small and medium-sized enterprises, including those in the agri-food sector, is granted free of charge and with priority over other interventions. Maximum guaranteed amount per single enterprise is equal to Euro 2.5 million, until March 2nd, 2021 for the benefit of SMEs with head office or operating units located in the municipalities identified in Annex 1 to the Prime Ministerial Decree of 1 March 2020 (so-called Red Zone). More in detail, the guarantee provides for a maximum percentage of cover (i) to the extent of 80% of the amount of each financing operation, for direct guarantee operations; (ii) to the extent of 90% of the amount guaranteed by Confidi or other guarantee fund, for reinsurance operations, unless the guarantees issued by the latter do not exceed the maximum percentage of cover of 80%. The guarantee Fund may be extended by Ministry of Economic Development's Decree, in agreement with the Ministry of Economy and Finance, for specific periods and within the limits of available resources, also to SMEs located in different areas than those located in the Red Zone, in view of the exceptional damage suffered due to the geographical location adjacent to the same areas, or belonging to a sector particularly affected, even if only in particular areas.

Increase in the budget of the SIMEST Fund

(Art. 27 of Law Decree no. 9 of March 2nd, 2020, which came into force on March 2nd, 2020)

Article 27 of Law Decree no. 9/2020, provides for an increase in the availability of the revolving fund to support the internationalization of Italian companies in non-EU countries for an amount of 350 million euros for the year 2020.

Extension of call for Drawings+4 and Trademarks+3, suspension of proceedings by the Patent and Trademark Office

(Directorial Decree March 9th, 2020 and Directorial Decree March 11th, 2020)

The Patent and Trademark Office has ordered the freezing of all proceedings under its jurisdiction expiring from March 9th to April 3rd 2020.

More in detail, Directorial Decree March 9th, 2020 extended the deadline for the submission of grant applications for Drawings+4 to April 22nd, 2020.

The purpose of this call is to support the innovative and competitive capacity of small and medium-sized enterprises through the economic exploitation of industrial designs/models on national and international markets.

The deadline for submitting grant applications for Trademarks+3 is also extended to May 6th, 2020, by Directorial Decree March 9th, 2020, with the aim of supporting MSMEs in the protection of trademarks abroad, encouraging the purchase of specialized services aimed at the registration of European and international trademarks.



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